

**United States District Court****STATE AND DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA

v.

**CRIMINAL COMPLAINT****CHRISTIAN AARON ALEXANDER**

CASE NUMBER:

(Name and Address of Defendant)

MS-11-355 SER

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about Sept. 19, 2010, June 15, 2011, and June 26, 2011, in Winona & Olmsted Counties, in the State and District of Minnesota, the defendant did, (Track Statutory Language of Offense)

unlawfully and knowingly commit the Hobbs Act violations described in paragraphs 2.a., 2.b. and 2.c. of the attached affidavit, and did unlawfully and knowingly use, carry, possess and brandish a firearm, that is, a Colt, model 1911, .45 caliber pistol, serial number 46811, during and in relation to, and in furtherance of, the crime charged in paragraph 2.c. of said affidavit,

all in violation of Title 18 United States Code, Sections 924(c)(1)(A) and 1951.

I further state that I am a Special Agent, ATF and that this complaint is based on the following facts:  
Official Title

See Attached Affidavit

Continued on the attached sheet and made a part hereof:



Yes



No



Signature of Complainant

Liane Sellner

Special Agent, ATF

Sworn to before me and subscribed in my presence,

25 August 2011 2:30 PM

Date

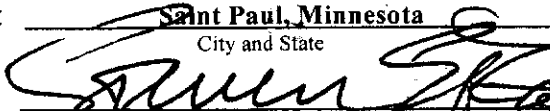
at

Saint Paul, Minnesota

City and State

Steven E. Rau, United States Magistrate Judge

Name &amp; Title of Judicial Officer



Signature of Judicial Officer

SCANNED

AUG 26 2011

U.S. DISTRICT COURT ST. PAUL

STATE OF MINNESOTA        )  
                                  ) AFFIDAVIT OF LIANE SELLNER  
COUNTY OF RAMSEY        )

I, Liane Sellner, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and I have been so employed since September 2003. I am currently assigned to the ATF Saint Paul Field Division, Saint Paul IV Field Office. My duties and responsibilities include conducting criminal investigations of individuals and organizations who may have committed violations of the federal arson, explosives, or firearms laws.

2. This affidavit is submitted in support of a criminal complaint charging Christian Aaron Alexander with the following offenses:

a. On or about September 19, 2010, in the State and District of Minnesota, Christian Aaron Alexander did unlawfully and knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in such commerce, by robbery, in that he did unlawfully and knowingly take and obtain personal property of the McDonald's Restaurant, 1620 Service Drive, Winona, Minnesota ("Winona McDonald's"), that is, approximately \$1,882 in cash and coin, in the presence of victim employees, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person, in violation of Title 18, United States Code, Section 1951.

b. On or about June 15, 2011, in the State and District of Minnesota, Christian Aaron Alexander in the State and District of Minnesota, Christian Aaron Alexander did unlawfully and knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in such commerce, by robbery, in that he did unlawfully and knowingly take and obtain personal property of the McDonald's Restaurant, 955 Highpoint Drive, N.E., Byron, Minnesota ("Byron McDonald's"), that is, approximately \$1,851.68 in cash and coin, in the presence of victim employees, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person, in violation of Title 18, United States Code, Section 1951.

c. On or about June 26, 2011, in the State and District of Minnesota, Christian Aaron Alexander in the State and District of Minnesota, Christian Aaron Alexander did unlawfully and knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in such commerce, by robbery, in that he did unlawfully and knowingly take and obtain personal property of the McDonald's Restaurant, 1937 N.W. Frontage Road, Rochester, Minnesota ("Rochester McDonald's"), that is, approximately \$2,740.55 in cash and coin, in the presence of victim employees, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person, in violation of Title 18, United States Code, Section 1951.

d. On or about June 26, 2011, in the State and District of Minnesota, Christian Aaron Alexander, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the crime set forth in paragraph 2.c., above, did unlawfully and knowingly use and carry a firearm, that is, a Colt, model 1911, .45 caliber pistol, serial number 46811, and in furtherance of such crime, did knowingly and unlawfully possess and brandish said firearm, in violation of Title 18, United States Code, Section 924(c)(1)(A).

3. The facts and information contained in this affidavit are based upon my personal knowledge and the investigation and observations of other officers and agents involved in the investigation. All observations referenced below that were not personally made by me were related to me by the persons who made such observations. This affidavit contains information necessary to support probable cause for this application. It is not intended to include each and every fact and matter observed by me or known to the government.

4. On September 19, 2010, the Winona Police Department responded to a report of an armed robbery at the Winona McDonald's. Two employees, V1 and V2,<sup>1</sup> reported that they were approached by two masked men as they entered the business shortly after 4:00 a.m.

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1. These abbreviations are used throughout in lieu of the victims' names in order to protect their identities.

They reported that the taller man was armed with a pistol, and the shorter man had a rubber mallet. One subject was wearing a "scream" mask and both were wearing gloves. The two men ordered V1 and V2 into the restaurant at gunpoint. The shorter man opened the safe after V1 gave him the combination. The men took the cell phones of V1 and V2 and the wallet of V2, which contained \$400 in cash. The men then ordered the employees into a walk-in cooler. V1 and V2 waited inside the cooler for approximately 20 minutes before they came out to discover the men had taken the store phones. Another employee, who had just arrived, then contacted the police. The owner of the Winona McDonald's later confirmed that approximately \$1,882 in cash and coin was taken during the robbery.

5. On September 20, 2010, the police in Rochester questioned a woman who was driving a 1997 Dodge Intrepid with stolen license plates. The police learned that the vehicle had been reported stolen on September 19, 2010, in Winona. The police found a purse in the vehicle that had receipts for recent purchases at Cub Foods and Wal-Mart in Rochester. A receipt for September 19, 2010, at 1:30 a.m., reflected a purchase of a "Scream" mask at the Wal-Mart. A receipt for September 19, 2010, at 1:44 a.m., reflected a purchase of "HM Jersey Gloves" at the Cub Foods. A review of surveillance videos from these stores reveals that a man, later identified as Christian Aaron Alexander ("Alexander"), was in these stores at these times presumably purchasing these items.

6. On June 15, 2011, shortly after at 4:00 a.m., two masked suspects, one male and one female, confronted an employee, V3, outside the Byron McDonald's after she had arrived for work. The male suspect had a pistol in his hand and used it to force V3 into the restaurant. Another employee, V4, was inside the restaurant. The male suspect ordered both V3 and V4 to give him their cell phones and identification. After taking V3's purse and cell phone, the male suspect ordered both employees into the cooler. A few minutes later, the male suspect let V4 out of the cooler after he complained of being cold. V3 remained inside the cooler. After the male closed the cooler door, V3 heard what sounded like a gunshot. The male suspect then opened the cooler door and V3 could see V4 lying on the ground uninjured. Shortly after this encounter, the restaurant manager, V5, arrived and was confronted by the male suspect inside the restaurant. The male suspect pointed a handgun at her and ordered her to open the safe. V5 opened the safe as directed and both suspects began putting money from the safe into a plastic bag. The suspects then took V5's cell phone and put her into the cooler with V3 and V4. The suspects also took V4's wallet, which contained approximately \$300. V3, V4 and V5 waited inside the cooler for a short time before leaving to call the police. Investigators later recovered a bullet near where the suspect fired the shot. The owner of the Byron McDonald's

later confirmed that \$1,851.68 in cash and coin was taken during the robbery.

7. On June 26, 2011, at approximately 5:00 a.m., employees of the Rochester McDonald's were robbed at gunpoint. The police spoke to V6, who stated that a single black male approached him in the parking lot of the restaurant as he arrived for work. The suspect pointed a handgun at him and told him that if he cooperated, everything would be all right. The suspect took V6 to the front doors of the restaurant where the manager, V7, was unlocking the business. The suspect forced both employees into the store and ordered them into the back of kitchen near the safe. The gunman ordered V6 to gather up the other employees who were in the restaurant. He then ordered a total of five employees to the floor and demanded they empty their pockets. The suspect took cash and cell phones from the employees and smashed their cell phones. The gunman directed four of the employees to lie on the floor while he ordered V6 to open the safe and remove the cash. The suspect placed the money into a McDonald's plastic salad bag and then ordered all five employees into the cooler. After the suspect left the restaurant, the employees were able to escape and contact the police. The owner of the Rochester McDonald's later confirmed that \$2,740.55 in cash and coin was taken during the robbery.

8. Because Alexander was a suspect in this and the two previous robberies, the police went to his residence early that

morning in Rochester. When an officer first arrived at his apartment building at approximately 5:22 a.m., the officer did not see Alexander's vehicle. She patrolled the area for a time and then saw Alexander's vehicle parked in front of his apartment complex in a place where it had not been earlier. The officer concluded that Alexander had just arrived from the robbery. The officer saw Alexander hunched over in his vehicle moving quickly as if he was in a hurry. The officer got out of her patrol car and approached Alexander, at which time he looked up and began to get out of his vehicle. The officer detained Alexander and secured him in her patrol car. She then returned to his vehicle to see in plain view a significant amount of cash lying on the back seat floor of the vehicle. A later search of the vehicle resulted in the seizure of a Colt, model 1911, .45 caliber pistol, serial number 46811, clothing articles similar to those described by the victims as being worn by suspect, a plastic bag containing numerous rounds of .45 caliber ammunition, an empty McDonald's salad bag, \$1,770 in cash lying on the floor and an additional \$674 in cash in a McDonald's bag. Following his arrest, Alexander was interviewed after waiving his *Miranda* rights and confessed to all three of the above-described robberies. He also admitted that he obtained the firearm used in the Rochester McDonald's robbery from his brother.

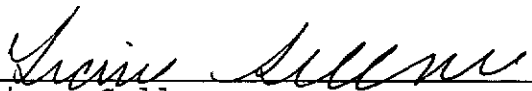
9. At all times material to this affidavit, the three McDonald's referenced above were restaurants engaged in the



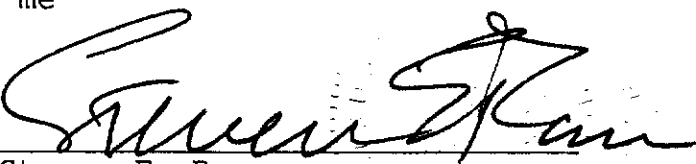
commercial sale of food items and beverages, and were businesses engaged in and affecting interstate commerce. The owners of these restaurants provided documentation that showed that many of the food items and supplies used by these businesses were obtained from vendors outside the State of Minnesota.

10. On August 24, 2011, I determined that the firearm referenced above was manufactured in Hartford, Connecticut, and was a firearm as defined under federal law.

11. Based on the foregoing, there is probable cause to believe that Christian Aaron Alexander unlawfully and knowingly committed the crimes described in paragraph 2, above.

  
Liane Sellner  
Special Agent, ATF

Sworn and subscribed to before me  
this 25 day of August, 2011.

  
Steven E. Rau  
United States Magistrate Judge